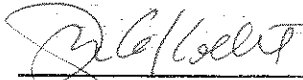


APPLICATION GRANTED
SO ORDERED

12/7/22 
John G. Koeltl, U.S.D.J.

December 7, 2022

Via ECF
Honorable John G. Koeltl
United States District Court for the Southern District of New York
500 Pearl Street-Courtroom 14A
New York, New York 10007

Re: Salvador Veras v. A.Duie Pyle, Inc. & Carlos Quinones Montanez
Docket Number: 1:21-cv-11186-JGK

Honorable Koeltl,

The parties have met and conferred with respect to discovery, and respectfully submit this joint status letter, and request for extensions of time to complete discovery at the direction of Your Honor.

Pursuant to the April 22, 2022 Case Scheduling Order, discovery was to be completed as follows:

Plaintiff Salvador Veras deposition August 4, 2022
Defendant Carlos Quinones Montanez deposition August 18, 2022
All parties to respond to outstanding interrogatories by June 30, 2022
Expert Reports to be exchanged by October 30, 2022
Depositions of any experts to be completed by December 30, 2022
All discovery to be completed by January 30, 2023
All parties to submit pretrial order by April 30, 2023

On August 31, 2022, Plaintiff served responses to Defendants Interrogatories and other initial discovery demands all dated August 3, 2022. On November 8, 2022, Defendants served responses to Plaintiff's Interrogatories and other initial discovery demands all dated February 24, 2022. The parties met and conferred following receipt of Defendants responses to interrogatories, and mutually agreed to re-schedule the deposition of Plaintiff Salvador Veras to November 17, 2022 and the deposition of Defendant Carlos Quinonez Montanez to December 8, 2022.

On November 14, 2022, counsel for Plaintiff was informed by Plaintiff that he had undergone right shoulder arthroscopic surgery on November 11, 2022. On November 15, 2022 plaintiff's counsel obtained a copy of the right shoulder operative report, and served a supplemental Rule 26 disclosure with the operative report, as well as duly executed HIPAA authorizations with respect to the November 11, 2022 right shoulder surgery.

Counsel for Plaintiff and Defendants met and conferred on November 15, 2022, and agreed that depositions would need to be re-scheduled in light of the recent surgery noted above. The parties have met and conferred several times since then, and have agreed upon the following revised discovery schedule, should it satisfy the court:

- Plaintiff Salvador Veras to be deposed on February 9, 2023
- Defendant Carlos Quinones Montanez to be deposed on February 16, 2023
- Independent Medical Examinations to be completed by April 10, 2023
- All expert reports to be exchanged by May 25, 2023
- Depositions of any experts to be completed by June 28, 2023
- All discovery to be completed by July 13, 2023
- All parties to submit pretrial order by July 27, 2023

Both Plaintiff's counsel and defendants' counsel thank Your Honor for your attention to this matter consideration of the above requests.

/s/Michael W. Mahan, Esq. for Plaintiff
William Schwitzer & Associates P.C.
820 Second Avenue- 10th Floor
New York, New York 10017
(212) 683-3800
mmahan@wsatlaw.com

/s/ Aaron Gross, Esq. for Defendants
Sobel Pevzner, LLC
464 New York Avenue-Suite 100
Huntington, New York 11743
(631) 549-4677
agross@sobelpevzner.com